

Pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1(h), Class Representatives Laborers Pension Trust Fund for Northern Nevada, Construction Laborers Pension Trust of Greater St. Louis, and Angelica Galkin (collectively, “Plaintiffs”), and Defendants Tom L. Ward (“Ward”), Matthew K. Grubb (“Grubb”), and James D. Bennett (“Bennett”) (collectively, “Defendants” and, together with Plaintiffs, the “Parties”) by and through their undersigned counsel, respectfully move the Court for an Order modifying the current schedule compelling Plaintiffs to file their motion and briefing in support of preliminary settlement approval by October 29, 2021 (ECF No. 555), as set forth below.

At the September 24, 2021 hearing and status conference, Plaintiffs moved orally for an extension of time to file their motion for preliminary approval of the settlements with Defendants Ward, Grubb and Bennett to October 29, 2021. The plaintiffs in the

related action captioned *Duane & Virginia Lanier Trust v. SandRidge Energy, Inc., et al.*, No. 15-cv-00634-G (W.D. Okla. 2015) (the “*Lanier Trust* Action”) joined the motion. The motion was unopposed, and the Court granted the extension in the above-captioned matter as well as in the *Lanier Trust* Action. *See* ECF No. 555; *Lanier Trust* Action ECF No. 455.

The Parties have been diligently negotiating a stipulation of settlement and coordinating efforts with the plaintiffs in the *Lanier Trust* Action, but the process is taking longer than anticipated because of the complexities of structuring and preparing long-form settlement stipulations governing two related securities class actions. The Parties have now generally agreed on settlement terms but require additional time to finalize the exhibits to the settlement agreement, including the notices of settlement to the class.

RELIEF REQUESTED

The Parties have stipulated to a modest extension of the deadline for Plaintiffs’ preliminary settlement approval motion and briefing, pending approval by the Court, as set forth in the chart below. The Parties hereby request that the deadline for filing Plaintiffs’ preliminary settlement approval papers be modified from on or before October 29, 2021 to on or before November 12, 2021.

Good cause exists to modify the current schedule. The Parties are continuing to finalize the terms of their settlement, and require additional time to complete definitive documentation of their settlement agreement, including exhibits and notices to the class, so that they can continue to work towards a successful global resolution of the instant litigation and the related *Lanier Trust* Action.

A proposed order is filed herewith.

Deadline	Current Date	Proposed Date
Plaintiffs to file their motion for preliminary approval of the settlement	October 29, 2021	November 12, 2021

DATED: October 26, 2021

Respectfully submitted,

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Dated: October 26, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2021, I electronically transmitted the attached Joint Motion for Schedule Extension using the ECF system for filing, which will send notification of such filing to all counsel registered through the ECF System.

/s/ Evan J. Kaufman

EVAN J. KAUFMAN